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5 UNITED STATES DISTRICT COURT
6 FOR THE WESTERN DISTRICT OF WASHINGTON
7 AT TACOMA

8 DREW MACEWEN, ANDREW BARKIS,
9 CHRIS CORRY, BRANDON VICK, KELLY
10 CHAMBERS, MICHAEL MCKEE, FRAN
11 WILLS, BRUCE RUSSELL, Phil Fortunato,
12 Dave McMullan, Isaac Vellekamp, and Marcus
13 Torrey,

14 *Plaintiffs,*

15 v.

16 JAY INSLEE, in my official capacity as the
17 Governor of Washington,

18 *Defendant.*

19 No. 3:20-cv-05423

20 DECLARATION OF ISAAC VELLEKAMP

21 I, Isaac Vellekamp, make the following declaration under penalty of perjury:

- 22 1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated
herein.
- 23 2. I am a resident of Washington.
- 24 3. I am also the owner of VNives, LLC ("VNives").
- 25 4. VNives is a manufacturer, importer, distributor, and retailer of knives and tools doing business
in Washington state.
- 26 5. VNives normally makes and sells safety tools and lifesaving emergency tools for government
employees such as police, firemen, and first responders, all of whom are designated "essential
workforce" by the Appendix to Proclamation 20-25.

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MACEWEN V. INSLEE

DECLARATION OF ISAAC VELLEKAMP - 1
No. 3:20-cv-05423

ARD LAW GROUP PLLC

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- 1 6. VNives also normally engraves medical devices for doctors and nurses, many of whom are also
- 2 designated “essential workforce” by the Appendix to Proclamation 20-25.
- 3 7. Despite this, VNives’ application for its employees to be designated as “essential workforce”
- 4 was denied.
- 5 8. VNives is closed as a result of the Proclamations.
- 6 9. VNives is closed as a result of the Proclamations even though it is fully capable of complying
- 7 with relevant hygienic and social distancing requirements.
- 8 10. VNives is forced to cease selling lifesaving tools even though fast food restaurants, coffee
- 9 shops, liquor stores, and marijuana dispensaries in Washington state are permitted to remain
- 10 open.
- 11 11. But for the Proclamations, VNives would be selling lifesaving tools.
- 12 12. VNives applied for, and was denied, both Paycheck Protection Program and other Small
- 13 Business Administration loans.
- 14 13. Because VNives was denied all loans, I have been forced to continue paying VNives’ employees
- 15 out of my own pocket, at a time when the business is not producing any revenue.
- 16 14. I am losing money every day due to the Proclamations.
- 17 15. Because I have been forced to shut down VNives while continuing to pay VNives’ employees,
- 18 I have already lost \$60,000.

9918 162ND ST. CT. E.
SUITE #4

SIGNED, May 19th, 2020, at Puyallup, Washington.

By: 
ISAAC VELLEKAMP